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June 13, 2022

BY ECF

The Honorable John P. Cronan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

This request is granted. If the plaintiff has not filed a notice of dismissal by July 15, 2022, then the parties shall file a joint status letter by that date. The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 11 and to stay this case.

SO ORDERED.
Date: June 14, 2022



JOHN P. CRONAN
United States District Judge

New York, New York

Re: Hedges v. Vtech Communications, Inc., 1:22-cv-01003

Dear Judge Cronan:

We represent Defendant Vtech Communications, Inc. ("Defendant") in the above captioned matter. Together with counsel for Plaintiff, Mr. Jeffrey Gottlieb, we respectfully request this Court to stay all deadlines in this action for thirty (30) days, from June 15, 2022 to July 15, 2022. In support of this request, Parties jointly state as follows:

Parties have reached an agreement in principle resolving all claims in this action, and anticipate moving for voluntary dismissal within the requested thirty-day period. On June 9, 2022, my colleague Surya Kundu conferred with Mr. Gottlieb via telephone and suggested that Parties jointly request a short stay so that they may finalize their efforts. Mr. Gottlieb agreed, and subsequently confirmed his agreement via email dated June 9, 2022.

This is the Parties' first request for a stay. Previously, in furtherance of their good faith resolution discussions, Parties jointly requested, and this Court granted, two extensions of Defendant's deadline to respond to the Complaint, which is currently set for June 15, 2022. *See* Dkts. 7-10.¹

Parties do not make this request to cause undue delay, but rather to complete their successful discussions and resolve all claims without incurring additional litigation expenses or burdening this Court's time and resources.

The Parties therefore jointly request that this Court stay all case deadlines for thirty (30) days, from this date up to and including July 15, 2022.

Respectfully submitted,



Ryan P. Poscablo

¹ Parties filed their first joint request on April 12, 2022, requesting a thirty-day extension to May 16, 2022. Dkt. 7. The Court granted this request on April 14, 2022. Dkt. 8. The Parties' filed their second request May 12, 2022 (Dkt. 9), which the Court granted on May 13, 2022 thereby extending the deadline to June 15, 2022. Dkt. 10.